

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**WATERWAYS TOWING & OFFSHORE  
SERVICES, INC.**

**Plaintiff,**

**v.**

**M/V LAURA GAIL, bearing  
official no. 1105173, her hull, tackle,  
gear, appurtenances, etc., *in rem***

**Defendant**

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**Civil Action No. 24-261**

***In Admiralty  
In Rem***

**VERIFIED COMPLAINT**

Plaintiff Waterways Towing & Offshore Services, Inc. files this Verified Complaint against the M/V LAURA GAIL, which bears official number 1105173, and states as follows:

1. This is a case of admiralty and maritime jurisdiction for enforcement of a maritime lien for dockage, as hereinafter more fully appears, and is an admiralty or maritime claim within the meaning of Rule 9(h) of the *Federal Rules of Civil Procedure* brought pursuant to 28 U.S.C. § 1333 and Rule C of the Supplemental Rules for Certain Admiralty and Maritime Claims.

2. Plaintiff Waterways Towing & Offshore Services, Inc. (“Waterways”) is a Alabama corporation with its principal place of business in Mobile, Alabama.

3. Defendant M/V LAURA GAIL (sometimes referred to herein as “Vessel”) is a tug boat whose official documentation number is 1105173. The Vessel is currently owned by S.P. Investments Inc., a foreign corporation with its principal place of business in Georgetown, Guyana.

4. Defendant is now within the jurisdiction of this Honorable Court.

5. At the request of S.P. Investments, Inc., Plaintiff Waterways has provided dockage services to Defendant Vessel since October 2021. The Vessel is currently docked at Plaintiff's facility.

6. Defendant Vessel is liable for dockage fees of \$53.85 per day since September 2023, a service charge of 1.5% per month (18% per year) on all overdue invoices, Plaintiff's attorney's fees, and other costs and expenses of collection.

7. Waterways has not been paid for the dockage services provided to Defendant Vessel since September 2023. Waterways is currently owed \$19,167.43 for dockage and late fees, plus interest, attorney's fees, and other costs and expenses of collection.

8. The amounts due Waterways constitute a maritime lien on the Vessel pursuant to applicable maritime law, 46 U.S.C. § 31342, and Rule C of the Supplementary Rules for Certain Admiralty and Maritime Claims.

WHEREFORE, Plaintiff prays that:

- a. Process in due form of law according to the rules and practices of this Court in cases of admiralty and maritime jurisdiction issue against the M/V LAURA GAIL, its hull, tackle, gear, appurtenances and all accessories thereto, and that all persons having or claiming any interest therein may be cited to appear and answer the matters aforesaid;
- b. This Court enter judgment, *in rem*, in favor of Plaintiff against Defendant Vessel in the amounts due Plaintiff, plus interest, attorney's fees, and other costs and expenses of collection;
- c. The Defendant Vessel be condemned and sold to pay the amount due to Plaintiff; and

- d. Plaintiff may have such other, further and different relief as justice may require.

Dated: July 30, 2024

/s/ Paul T. Beckmann

PAUL T. BECKMANN (BECKP0493)  
Attorney for Plaintiff Waterways Towing &  
Offshore Services, Inc.

OF COUNSEL:

HAND ARENDALL LLC  
Post Office Box 123  
Mobile, Alabama 36601  
Tel: (251) 432-5511  
Fax: (251) 694-6375  
Email: pbeckmann@handarendall.com

**PLEASE ARREST THE M/V LAURA GAIL AT THE PREMISES OF WATERWAYS  
TOWING & OFFSHORE SERVICES, INC., 91 HARDWOOD LANE, MOBILE,  
ALABAMA 36611.**

**VERIFICATION**

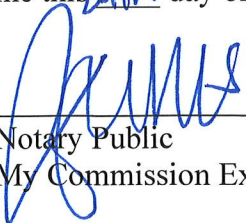
STATE OF ALABAMA                     )  
COUNTY OF MOBILE                 )

Personally appeared before me, the undersigned authority in and for said state and county, Samuel Slade Hooks, Jr., who after being duly sworn, did depose and say as follows:

That he is the President of Plaintiff herein, Waterways Towing & Offshore Services, Inc.; that he has read the foregoing complaint and he knows the contents thereof; that the same are true and correct except those allegations made on information and belief and those he verily believes to be true; that the source of his information and the grounds of his belief are his personal knowledge and documents and information contained in the records of the Plaintiff.

  
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SAMUEL SLADE HOOKS, JR.

Subscribed and sworn to before  
me this 20th day of July 2024.

  
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Notary Public                     Erika Cruz Rivers  
My Commission Expires:   Notary Public, Alabama State At Large  
  My Commission Expires 04/25/2027